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February 1, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals, 445 12th Street, S.W.
Washington, D.C. 20554

RE: Certificate of CPNI Filing February 1, 2006

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice EB-06-TC-060, dated January 30, 2006, Telecom New Zealand USA Ltd., ("TNZ USA") hereby timely files its section 64.2009 compliance certificate and accompanying statement explaining the procedures in place.

Copies of this report have been submitted to Mr. Byron McCoy at the Enforcement Bureau, and the FCC's copy contractor pursuant to the Public Notice.

If you have any questions or concerns about the enclosed report, please contact me at (626) 432-4300.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurie Miller". The signature is fluid and cursive, with a long horizontal stroke at the end.

Laurie Miller

47 C.F.R. 64.2009 Compliance Certificate

I certify that I am an officer of Telecom New Zealand (USA) Ltd. (TNZ USA); that I have personal knowledge of TNZ USA's operating procedures. TNZ USA has established operating procedures that are adequate to ensure compliance with the Commission rules regarding the confidentiality of CPNI. Such procedures in place are outlined in the accompanying statement.

Printed Name: Laurie Miller

Position: President

Signature: 

Date: February 1, 2006

Contact Person: Laurie Miller

Telephone: (626) 432-4300

47 C.F.R. 64.2009 Compliance Certificate Accompanying Statement

Telecom New Zealand (USA) Ltd. (TNZ USA) has implemented a system that the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

TNZ USA has entered into confidentially agreements with all its customers and suppliers and as such is precluded from releasing any of this information.

TNZ USA has trained its personnel as to when they are, and are not, authorized to use CPNI with an express disciplinary process in place.

TNZ USA maintains a record of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. TNZ USA further maintains a record of all instances that CPNI was disclosed or provided to third parties, or that third parties were allowed access to CPNI. Such records conform to the requirements of 47 C.F.R. 64.2009. It should be noted however, that TNZ USA is a reseller that only sells its services to other carriers. As such, TNZ USA has no end user customers.

As stated above, TNZ USA is a reseller only and does not undertake any outbound marketing.

TNZ USA has a procedure in place to notify the Commission of any instance that the opt-out mechanisms do not work properly as required by 47 C.F.R. 64.2009.